

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

JAN 17 2017 *AB*

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Anthony White

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

1:17-cv-0375

Judge Joan B. Gottschall
Magistrate Judge Jeffrey Cole
PC1

1.) The City of Chicago Department
of Police

2.) Officer (Sanders SR.) #6333

Beat 6520A

3.) Officer (Driver) #19493

Beat 6520D

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

United States District Court
Northern District of Illinois
Eastern Division

Plaintiff:

Anthony White

Defendants

vs.

Case No: ~~17-12345~~

4.) Detective (Haleem) #21488 Beat 05261

5.) Detective (Ivory) #20575

6.) Officer (Burrell Jr.) #9680

Beat 0302

7.) State Attorney (Gonzales, A.)

✓ Complaint Under The Civil Rights Act, Title 42 Section 1983
U.S. Code (state, county, or municipal defendants)

✗ Complaint Under The Constitution ("Bivens" Action), Title 28 Section 1331
U.S. Code (Federal defendants)

Other (cite statute, if known)

I. Plaintiff(s):

- A. Name: Anthony White
- B. List all aliases: Imanii
- C. Prisoner identification number: #20150720211
- D. Place of present confinement: Cook County Jail
- E. Address: 2650 S. California Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: The City of Chicago Department of Police
Title: The City of Chicago Department of Police
Place of Employment: Department of Police
- B. Defendant: Officer Sanders Sr. # 6333
Title: Chicago Police (detective)
Place of Employment: District 005 (111th S. Bishop Ford Exp.)
- C. Defendant: Officer Driver #19493
Title: Chicago Police (detective)
Place of Employment: District 005 (111th S. Bishop Ford Exp.)

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Continue:

Plaintiff: Anthony White

List all aliases: Imonji

ID number: 20150720211

Place of confinement: Cook County Jail

Address: 2650 S. California, Chicago, IL 60608

Defendant(s):

D. Defendant: Detective Haleem, Morad #21488

Title: Chicago Police (detective)

Place of Employment: 005 District (111th S. Bishop Ford Exp.)

E. Defendant: Detective Ivory #20575

Title: Chicago Police (detective)

Place of Employment: 005 District (111th S. Bishop Ford Exp.)

F. Defendant: Officer Burrell Jr. #9680

Title: Chicago Police (detective)

Place of Employment: 005 District (111th S. Bishop Ford Exp.)

G. Defendant: State Attorney Gonzales, A.

Title: State Attorney City of Chicago

Place of Employment: 005 District (111th S. Bishop Ford Exp.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: None
- B. Approximate date of filing lawsuit: None
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: None
- D. List all defendants: None
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): None
- F. Name of judge to whom case was assigned: None
- G. Basic claim made: None
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): None
- I. Approximate date of disposition: None

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

My name is Anthony White and I was a victim of an "investigative alert", that resulted into a false arrest and false imprisonment by the 005 District (111th S. Bishop Ford Exp.) Chicago Police Department, and other parties. I was arrested on my property at my home at 501 E. 80th St. in Chicago, under an active "investigative alert # 299987681", which is not an "arrest warrant". The illegal arrest occur on July 19, 2015 at approximately between 7:00 to 8:00 PM. I was arrested by 1st (Officer Sanders Sr.) star # 6333 - Beat 6520 A and his partner 2nd (Officer Driver) star # 19493 - Beat 6520 D. The Chicago Police dragged me and then escorted me out my apartment and to their car outside. Factual Background: On July 19, 2015, I, Anthony White was at my residence 501 E. 80th St. in Chicago, IL with my friend, Tashia. I wasn't violating any laws or committing any crimes. This is an illegal arrest and false imprisonment because the Chicago Police didn't follow the Constitution of the United States or the Illinois Constitution. The arrest was illegal for

lack of no "search warrant." If I was identified in a photo lineup as participating in a crime which I didn't have no part in, why was I arrested under an investigative alert and not a warrant? This is a question I have wrote to Daray, L star # 1527, the Approving Supervisor who has approval of probable cause. I haven't received a response to my question for concern to this matter at all. These police officers had no search warrant, no arrest warrant, and therefore were not authorized to enter my apartment. The police officers were not invited into my apartment. They knocked on my door a couple times stating that their the police, and I didn't respond to their knock because I was in my room sleep in my bed. I left my keys in the door and the police came in without my permission, then they asked me where was my boyfriend, "Joshua Williams." I told them that I don't know and he doesn't even lived here, so they then asked me do I have an I.D. I told the officers yes and showed them it, and then they look at one another and said to themselves, "yeah this is one of them." Then, the officers handcuff me and I told them, "I didn't do

do anything and where you taking me". The officers just told me that I'm coming to the police station to be questioned about something. They grabbed me off my bed and made me put some shoes on to go with them, and I told my friend, Tashia to call my boyfriend to let him know what's going on. Before the officers escorted me out my apartment, and threaten my friend, Tashia telling her "if you call him, we are going to come back and get you too." I fear for my life, and I kept telling the officers that they have the wrong person. They told me to shut the fuck up and was manhandled into their car, and I wasn't resisting and I'm a transgender woman as well. False imprisonment is an unlawful violation of the personal liberty of another and consists of confinement or detention without legal authority. Permission for them to enter was not allowed at all, and I was sleep and they walk into my apartment on their own free will. I was violated and hurt. The handcuffs were too tight on me, and I asked the "Arresting Officers" could they please unloose the cuffs a little. The officers just laughed, and told me that we will be at the police station in a little bit. I was placed inside their car and being torture with questions. I told the police officers that they have the wrong person, I go to school, and I do hair. He just kept giving me a slick facial expression, and told me that "we just need your boyfriend now". I kept asking the officers why am I under arrest, and they just

told me that we can't disclose that, but you will find out when we get to the police station. The police officers entered my apartment without a warrant, it was not an exigent circumstance. The right of people to be secure in their homes shall not be violated. I asked the detectives did I have a warrant for my arrest, and at that moment it was hostility with them. They told me that you're facing a lot of time in prison, unless you give up your boyfriend and his whereabouts. The police had transported me to a Chicago Police station against my will. No municipality has authority to clothe any officer with the autocratic power to order the summary arrest and incarceration of any citizen without a warrant or process of law, and thus render the liberty of everyone of its officers. That's when I was unlawfully restrained and illegally seized from my property/home and taken into custody. Once, I got to (111th⁵ Bishop Ford Exp) Police Station, I was taken to a room and handcuffed to a wall. I asked could I call someone to let them know where I'm at, but the detectives told me that when they're done questioning me I will get a phone call later. After 15 minutes of being there, Detective - Htaleem star # 21488 came into the room where I was handcuffed and began to question me. I agreed to talk to them but I told them I didn't do anything, idk where my boyfriend is at, and that me and him don't have anything to do with what they're trying to charge us with. For about 30 minutes, the detectives kept asking me the same questions in a different order to try to get me confused. When he was done questioning me, I asked him can I go home and the officer told me

that he believes I have something to do with the "armed robbery/aggravated kidnapping". He told me that I might as well relax because I'm going to the county. A neutral Judge or magistrate must issue a felony arrest warrant. If there is time to get a supervisor's approval for the investigative alert, as the special order requires, there is time to seek an arrest warrant from a member of the Judiciary. An officer has no more right to disregard and violate the constitution than the accused has to violate the law. It is the duty of the officers to support and maintain the constitution. I wasn't told or read my "miranda rights". The police continue to abuse their power by constant questioning me without counsel. Whenever a person is in any manner restrained of his liberty or detained in any manner from doing what he's desired, it constitute an arrest. I didn't get fed until around 1:30 at night, I was in a cell all night that was cold, didn't have any pillow or blanket, and the law enforcement just gave me terrible treatment. I was in school trying to better myself out there since me and my boyfriend is all I have because I was a ward of the state throughout my childhood. I lost my apartment, clothes, and everything that I worked ~~to~~ hard to get now. I'm in protective custody because I'm a transgender woman, and I'm housed in Division 9 (supermax) where other inmates fight all the time, gangbang, and play with shanks everyday too. When officers assume the power to imprisoned without authority of law or without any of the form or processes usual and necessary to be employed they become liable for illegal arrest and false imprisonment. I was held without probable cause, and I ~~was~~ asked to leave and that was denied. I asked why was I taken from my home inside my apartment without a search warrant or arrest warrant? The detectives told me

that they claim to have one. I asked to see it and the detectives told me that I will see it, but they never came back to the holding cell I was in to let me see it. I'm not the smartest person, but I know when I'm being mistreated wrongly. These are the people that are suppose to uphold the law and "to serve and protect." I was search against my own free will and the police coercion, me too.

Anthony White

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.


I, the plaintiff am requesting for injunction relief and monetary compensation for violating my rights as a free citizen. I'm seeking \$1,000,000. I lost my apartment, my clothes, and everything. I don't have any family out there to depend on because I was in DCF's growing up. Cook county jail is unsanitary and dangerous with the fact that I'm a transgender woman. These people need to be punish, so that other citizens won't suffer illegal treatment from the police.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this January day of 5, 20 17


(Signature of plaintiff or plaintiffs)

Anthony White
(Print name)

20150720211
(I.D. Number)

2650 S. California Chicago, IL 60608
(Address)